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Attorneys for Debtors and Debtors in Possession

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

SEARS HOLDINGS CORPORATION, et al., : Case No. 18-23538 (RDD)

:

Debtors.<sup>1</sup> : (Jointly Administered)

:

NOTICE OF WITHDRAWAL REGARDING FIFTEENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM (NO LIABILITY) SOLELY AS TO CERTAIN CLAIM

The Debto

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR - Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

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PLEASE TAKE NOTICE that on March 31, 2020, Sears Holdings Coproration and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") filed the *Debtors' Fifteenth Omnibus Objection to Proofs of Claim (No Liability)* (ECF No. 7541) (the "Fifteenth Omnibus Objection").

PLEASE TAKE FURTHER NOTICE that Debtors hereby withdraw without prejudice the Fifteenth Omnibus Objection solely with respect to the claim listed on <a href="Exhibit 1">Exhibit 1</a> attached hereto.

Dated: May 4, 2020

New York, New York

/s/ Garrett A. Fail

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## Exhibit 1

In re: Sears Holdings Corporation, et al. Case No. 18-23538 (RDD)

| Ref<br># | Name of Claimant                           | Affected<br>Claim<br>No. | Affected Ballot<br>No. | Ballot<br>Amount | Amount to be<br>Expunged | Reason for Disallowance and<br>Expungement  |
|----------|--|--------------------------|------------------------|------------------|--------------------------|---|
| 9.       | HC Lakeshore, LLC c/o B.V. Belk Properties | 20081                    | 182353801017974        | \$5,508.05       | \$5,508.05               | The Claims refer to lease rejection damages and expenses following the Lease Rejection Dates, and thus are not an assertible Administrative Expense Claim |